

### **REMARKS**

In the foregoing amendment, claim 24 has been amended. Pending in the application are claims 1-46, of which claims 1 and 24 are independent. The following comments address all stated grounds for rejection, and the Applicant's respectfully submit that the presently pending claims, as identified above, are now in a condition for allowance.

#### **Allowable Subject Matter**

The Applicants wish to thank the Examiner for indicating that Claims 14, 16, 17, 19-21, 23, 37, 39, 40, 42-44 and 46 would be allowable if rewritten in independent form.

#### **Claim Amendments**

Applicants have amended claim 24 to clarify the scope of the claimed invention. In particular, claim 24 has been amended to recite a program in a computer programming language having *dynamic types* and overloaded functions. The limitation is added to parallel claim 1, which is a corresponding method claim. No new matter is added.

#### **Claim Rejections Under 35 U.S.C. 102**

Claims 1-13, 15, 18, 22, 24-36, 38, 41 and 45 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,805,887 to Wang ("Wang"). Applicants respectfully traverse the rejection for the following reasons.

Independent claims 1 and 24 recite a method and a computer program product, respectively. At a first point in a program in a computer programming language having *dynamic types* and overloaded functions, a function data structure is constructed using a function name. The function data structure includes information leading to a set of functions visible at the first point. At a second point, the function data structure is applied to an argument list, wherein a function is selected and called using the function data structure.

Wang relates to a universal pointer object.

Applicants respectfully submit that the cited reference fails to disclose each and every element of the claimed invention. Applicants submit that Wang does not disclose a program in a computer programming language having *dynamic types* and overloaded functions, as recited in claims 1 and 24. The claimed invention relates to programming languages having *dynamic types* and overload functions.

Some programming languages are statically typed in which the types of expressions are fixed by the text of the program. Thus the compiler can determine the types of arguments of a given function call in the program text. C++, which is disclosed in the Wang reference, is an example of the statically typed programming language. (See, Page 3, lines 18-22 of the Specification). Other examples of the statically typed programming languages could be found in C, JAVA, etc.

In comparison, the claimed invention relates to dynamically typed programming languages in which the types of expressions are assigned at runtime, rather than assigning a type in the program source code. Examples of the dynamically typed programming languages could be found in MATLAB. Applicants submit that the Wang reference does not disclose a dynamically typed programming language, as recited in the claimed invention.

In particular, Wang discloses at column 3, lines 26-35 that the compiler (22) receives at least a statement declaring the type of a member function, which means that the type of a member function is fixed by the text of the program. This clearly proves that the Wang reference discloses a statically typed programming language, such as C++. The Wang reference does not disclose the dynamic types.

In light of the aforementioned arguments, Applicants respectfully submit that Wang fails to disclose each and every element of independent claims 1 and 24. Applicants therefore request the Examiner withdraw the rejections of claims 1-13, 15, 18, 22, 24-36, 38, 41 and 45 under 35 U.S.C. §102(b), and pass the claims to allowance.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If, however, the Examiner considers that further obstacles to allowance of these claims persist, we invite a telephone call to Applicants' representative.

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Respectfully submitted,

By 

Kevin J. Canning

Registration No. 35,470

LAHIVE & COCKFIELD, LLP

28 State Street

Boston, Massachusetts 02109

(617) 227-7400

(617) 742-4214 (Fax)

Attorney for Applicants